

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The following is a description of annual goals and progress:

1. Homeless housing & services:

- Support renovation of facilities: (240 goal, 200 actual) A renovation of shelter for victims of domestic violence was 83% completed during the 2017 program year, and was fully completed during the 2018 program year.
- Fund efforts to prevent homelessness: (78 goal, 53 actual, 68% complete) Two projects providing emergency housing and homelessness prevention were 100-105% completed during the program year, and one made no progress due to late release of funds and the receipt of program income. One 2017 activity, Welcome House, which was to provide emergency overnight shelter, was cancelled due to lack of progress and the subrecipients belief that no measurable progress would be made.

2. Rental housing: renovate existing units (26 unit goal): No rental units were rehabilitated although CDBG funds were awarded to the Housing Authority (developer) for renovation of a Section 8 housing project. The 2016 project (Washington Court) had been delayed due to the length of time it took for 2017 CDBG funds to be issued, although construction has begun in the 2018 program year. The 2017 project, the Row Houses, also made no progress in the 2017 program year but the bid process began in the 2018 program year.

3. Improve public facilities that serve LMI households or persons with disabilities (7007 goal, no progress). Four projects were funded, and none made progress until the 2018 program year. 23rd Street Park is currently underway, and is nearing completion in 2018. Three 2017 projects, to renovate a youth center, a housing and supportive services center for persons with mental illness, and a senior center, all made progress in the early part of the 2018 program year, but none during the 2017 program year.

4. Promote Special Needs Housing: (18 goal, none complete) A 2017 project to create rehabilitate homeowner housing for special needs residents was 42% completed. Progress was slow due to staffing issues, although this appears to be resolved in the 2018 program year.

5. Support efforts to increase LMI homeownership: support homeownership through new units or renovation of existing ones (goal: 47 units).

Accomplishments for this goal included houses rehabilitated through the emergency rehab program (2017 funds - no progress. 2015 funds - 50% and 2 units) and the housing accessibility program (2016: 25% complete and 2017: no progress). Progress with the accessibility program was slow due to staff turnover at the Community Action Agency, although a new hire has already produced some positive results. In addition, the late release of funds in 2017 impacted the ability of sub-recipients to make progress.

4. Improve access to public services (115 goal, no progress): None of the 2017 projects were completed during that program year due to the late release of funds, but progress was made in the early portion of the 2018 program year.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Allocate funds to prevent homelessness	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	191		0	7	
Allocate funds to prevent homelessness	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	

Allocate funds to prevent homelessness	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	500	172	34.40%	118	7	5.93%
Assist development of additional homeless housing	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	10	0	0.00%			
Assist with development or renovation of rental	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	6	0	0.00%			
Assist with development or renovation of rental	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	20	0	0.00%	2	0	0.00%
Assist with development or renovation of rental	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Improve the quality of public facilities	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1850	2841	153.57%	7170	52	0.73%
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	16				

Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	200	0	0.00%			
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Rental units constructed	Household Housing Unit	5	0	0.00%			
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Rental units rehabilitated	Household Housing Unit	72	0	0.00%			
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	3		6	0	0.00%
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0				
Promote special needs housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				

Provide for homeless service providers	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	57		25	0	0.00%
Provide for homeless service providers	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	57				
Provide for homeless service providers	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
Provide for homeless service providers	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	800	0	0.00%			
Support efforts to increase homeownership for LMI	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0				
Support efforts to increase homeownership for LMI	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	135	22	16.30%	10	2	20.00%
Support public service activities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	925	516	55.78%	115	0	0.00%

Support public service activities	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
Support renovation of facilities serving homeless	Homeless	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	200		425	0	0.00%
Support renovation of facilities serving homeless	Homeless	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	400	0	0.00%			
Support renovation of facilities serving homeless	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	200				
Support renovation of facilities serving homeless	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan,

giving special attention to the highest priority activities identified.

The City made reasonable progress in meeting goals in the third year of the Consolidated Plan. In 2017, the City funded 16 CDBG activities. While none of these activities were completed in the 2017 program year, 9 projects have since gone underway; and 7 have not yet started. In addition, 4 projects funded in prior years were completed. The City listed 8 primary priorities and goals in its Plan and most of the activities funded in 2017 addressed those priorities. The City continued to prioritize public service activities which addressed prevention of homelessness or provided emergency assistance for persons who were homeless. The City also funded rehab of an emergency shelter. About 22% of the project funding was awarded to activities addressing homelessness concerns. Over half of the 2017 project funds were allocated to housing activities, but both were uncompleted. Improvements to public facilities also followed priorities with funding going to improving facilities serving victims of domestic violence, the elderly, mentally ill persons, and youth at risk. However, the City fell behind in meeting goals for creating affordable housing, units for persons who are homeless, and special needs housing. Funding and local agency capacity are major concerns, so most of the CDBG funds are allocated for prevention of homelessness or emergency shelter. Unspent public services funding from prior years enabled the City to increase funding for prevention of homelessness. As a result, more households were assisted, and the annual goal was exceeded. The overall goal for improvement of public facilities was exceeded. Homelessness will continue to be a priority for the City due to local need and the recent closure of an emergency shelter. The City will continue to focus on affordable housing, but lack of resources and the high costs continued to be the major obstacles.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	59
Black or African American	10
Asian	0
American Indian or American Native	36
Native Hawaiian or Other Pacific Islander	0
Total	105
Hispanic	0
Not Hispanic	105

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

IDIS data on the actual number of beneficiaries does not match the above CAPER table since racial categories are different. For instance, IDIS requires that we report beneficiaries that identify themselves as more than one race (e.g., Asian & White), but this table does not include such classifications. Also, the CAPER Goals & Outcomes table does not include activities that were funded prior to approval of the current Consolidated Plan, but were completed in Program Year 2017. As a result, the total number of beneficiaries for 2017 would be 294. A table that presents the IDIS statistics, 2010 Census data for comparison, and additional information on the income has been attached. This information shows that the race of CDBG beneficiaries was similar to Census data.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	615,554	173,504
HOME	HOME		
HOPWA	HOPWA		
ESG	ESG		
Other	Other		

Table 3 - Resources Made Available

Narrative

The City of Bismarck received \$328,206 in CDBG funds for program year 2017. A total of \$169,485 was spent during the year. This included funds from 2016, 2015, and pre-2015. Public service expenditures accounted for 11.3% of the total spent, while administration totaled 19.2%. The total low and moderate income benefit was 100 percent. \$25,000 in program income was received during the program year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide			Funds are not targeted geographically, but are available citywide

Table 4 – Identify the geographic distribution and location of investments

Narrative

Funds are not targeted geographically, but are available citywide. Programs are based on an individual applicant meeting eligibility criteria rather than geographic area. No target area was selected in the Consolidated Plan

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City does not require a set amount of match for the subrecipients that it funds under the CDBG program. However, match is taken into consideration when proposals for CDBG funding are reviewed. Match sources include in-kind labor, private donations, United Way funds, foundation support, state funds and federal funds. No publicly owned land or property was used to address needs in the Plan. Previously funded HOME projects generate an annual state supportive service match of up to \$3 million that can be used when the City applies for HOME funding from the State of North Dakota.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	130	8
Number of Special-Needs households to be provided affordable housing units	6	0
Total	136	8

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	78	51
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	26	8
Number of households supported through Acquisition of Existing Units	0	0
Total	104	59

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Lack of resources and organizational capacity are both concerns in meeting housing goals. CDBG funding for rental assistance is used for security deposits, 1st month's rent, or back-rent in order to prevent homelessness (107 beneficiaries). The City also uses HOME funds from the state of North Dakota to fund a tenant based rental assistance (TBRA) program that provides rental assistance for one year. Generally, 4 to 6 households receive this assistance a month, and about 20 to 25 households receive security deposits. However, this program data is included with the State CAPER. A CDBG housing project to rehab

26 units of Section 8 rental housing was held up due to delays, including issues with the allocation of State HOME funds.

Discuss how these outcomes will impact future annual action plans.

The City will continue to fund its emergency rehab and housing accessibility programs in 2018. CDBG staff will continue to provide training when subrecipients experience employee turnover. The City will increase efforts to support affordable housing projects through such means as LIHTC, applying for HOME funds, and exploring ways to reduce development costs. The City's main partner in this effort will continue to be the local housing authority, but will also encompass nonprofit and for profit developers. However, high local development costs will likely mean that the City will continue to focus on preservation of existing affordable housing.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	31	0
Low-income	17	0
Moderate-income	3	0
Total	51	0

Table 7 – Number of Households Served

Narrative Information

Beneficiaries for the rental assistance (subsistence payments) are as follows: 31 extremely low income, 18 low income and 3 moderate income households.

Worst-case needs: City representatives make an ongoing effort to meet with local organizations to plan for future needs. For instance, the City has been involved in planning for a new soup kitchen to replace a closed one, and the new kitchen opened in the spring of 2018. The City met with agencies serving persons who are homeless to address potential concerns such as emergency housing needs during the winter. A number of City departments were actively involved in crisis planning to replace a men's emergency shelter that closed in the last year. Over the past year, the City has been working with the housing authority and a nonprofit developer to develop a housing first project for homeless adults with substance abuse and/or mental health concerns (NSP funding). The City continues to award CDBG funds to prevent homelessness to several local organizations. City staff has met with housing owners/developers to try to come up with ways to preserve existing affordable housing rather than to lose it. The City works closely with the local housing authority in order to gain knowledge of the current rental market and to plan joint activities to try to foster affordable housing. The Police, Fire and Public Health Departments actively meet throughout the year to jointly plan for unexpected emergencies.

Affordable Housing: The City used both CDBG and HOME funds to try to meet affordable housing needs. Both HOME and CDBG funds were awarded to a project to renovate Washington Court, a Section 8 housing project for low income households. CDBG funds are used for both housing accessibility and emergency housing rehabilitation. The City used State NSP funds to help develop a housing first project for homeless adults. CDBG funds were used to rehabilitate public facilities that provide housing and services to at risk youth and adults with mental illness. HOME funds from the State of North Dakota are also used for both security deposits and tenant based rental assistance. The City has actively worked with owners and developers to both preserve affordable housing or to develop new housing.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City continues to maintain active membership in the Missouri Valley Coalition for Homeless Persons. This organization is responsible for conducting the point-in-time homeless surveys and for education, outreach, and coordination of regional participation in the Continuum of Care process. No local agency has applied for CDBG funding for this purpose in 2017, but some agencies use EDSG or state funds for this purpose, as well as for other activities. The local police department supplements their efforts.

Addressing the emergency shelter and transitional housing needs of homeless persons

CDBG funds are being used to renovate an emergency shelter for victims of domestic violence and their children, which was 83% completed at the end of program year 2017. This activity is a multi-year project. The City also provides support for local agencies applying to the State for ESG funding. CDBG funds are also used to provide emergency shelter at motels for families when no other alternative is available, although that project was later cancelled due to lack of activity through that agency. CDBG funds were also being used for rehab of facilities that provide housing and shelter to persons with mental illness, and another which supports at-risk youth and their families.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City awarded CDBG funding to three local nonprofit agencies in order to prevent homelessness. Funds are used for security deposits, first month rent, and unpaid rent or utilities. In the 2017 program year, 52 households received this assistance. One of the agencies receiving funding focuses on persons with chronic mental illness and it used other funding sources to provide supportive services. The City also used a portion of its HOME funding from the State of ND to fund both security deposits and tenant based rental assistance. The local Community Action agency manages this program and also provides supportive services to assisted families in order to encourage self-sufficiency. Six local agencies continue to receive ESG and State Homeless Grants for a variety of program needs.

Helping homeless persons (especially chronically homeless individuals and families, families

with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Local agencies work with the HUD-VASH Program to provide rental assistance and support services. Several agencies provide transitional housing (or housing support) with case management services through their own staff or through referrals. CDBG funds were awarded to West Central Human Service Center to be used for subsistence payments (e.g., rent, security deposits). This agency in turn provides case management to help persons with mental illness avoid homelessness. Other agencies receiving CDBG assistance also provide case management services depending upon household needs. The Community Action project (HOME funds) provides ongoing case management assistance for the year in which households may receive rental assistance. This support helps households to more permanent housing options. Such services will continue be needed for the remainder of the Consolidated Plan.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Burleigh County Housing Authority manages 282 units of Public Housing. This includes both elderly and family housing. None of these units were designated as troubled or problematic. Most of this housing was built 25-35 years ago and needs improvements for code compliance, energy efficiency, accessibility, and modernization. The Housing Authority has used both public and private funds to implement major improvements, and the City has supported these efforts with CDBG and HOME funding. Demolition of antiquated units allowed the construction of new special needs housing (non-Public Housing). The Housing Authority also manages approximately 1,100 vouchers, 48 units of special needs housing, 40 Shelter Plus Care Vouchers, 40 basic care units for the frail elderly, and 96 units of Section 236 housing for families. The City continues to consult with the Housing Authority on its needs for renovation/preservation of existing units and the need for the development of new housing. It also provides technical support, such as the provision of environmental reviews. The City awarded 2017 CDBG funding for the renovation of Row Houses, which has not yet begun due to delays in other funding. In addition, 2017 CDBG funding was allocated for for the renovation of Washington Court (Section 8 for families), but the project has not started due to delays with State HOME funding.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

Tenants in both elderly and family housing have advisory councils. Each council holds monthly meetings, and the Housing Authority board meets with the councils a minimum of once per year. The councils have their own activity budgets and use the funds for tenant activities throughout the year. The Housing Authority administers a non-HUD sponsored self-sufficiency program that is open to any of its tenants. Approximately 20 households a year participate. The services are coordinated with other local agencies. Several tenants each year participate in a program that provides training and counseling to promote homeownership in order to purchase the unit of Public Housing that they are renting (e.g., single-family dwellings). Escalating property values in the past several years have made it more difficult for households to qualify.

Actions taken to provide assistance to troubled PHAs

Burleigh County Housing Authority is not a troubled PHA.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City continues to seek ways to reduce the barriers to affordable housing addressed in the Consolidated Plan. This has included allowing reduced roadway widths in order to save costs in residential subdivisions. The City also now allows accessory dwelling units in residential areas. It has recently approved an in-fill and redevelopment plan in order to allow the construction of more housing in existing areas on lots that are smaller than a typical lot in a new subdivision. A Quiet Rail Zone has been implemented in the downtown area and no train whistles will be blown in this area, which is expected to encourage more housing in this area.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City worked with the local homeless coalition, United Way, and service providers to replace two soup kitchens that had closed. This new facility was purchased in March 2017, and opened in January of 2018. The City staff and Commissioners are active participants in local efforts to find means to address the recent closure of the only mens emergency shelter and 24 SRO's. The City continues to prioritize its CDBG and HOME funding for activities that address homelessness or prevent homelessness.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Bismarck has not historically had a large number of lead based poisoning in children, but this could be because of lack of awareness and training. The local public health department administers the Health Track Program which provides testing for young children whose parents are eligible for Medicaid. Any CDBG assisted residential property (non-elderly) or facility in which young people are normally present is tested for lead based paint prior to work being done on the property if it was constructed prior to 1978. The City provides information on training and property construction procedures to contractors and maintenance works. It also provides referrals for LBP training if needed. The City consults with the State Health Department on technical concerns and for assistance in working with new contractors.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The primary activities undertaken to alleviate poverty include economic development, family self-sufficiency programs, and assistance to human service agencies that provide support services or training and employment activities for disadvantaged persons. The City continues to support the local development corporation with local sales tax revenue. The two entities work cooperatively to expand local economic opportunities. Downtown groups also work together to encourage improvements and employment through such means as the Renaissance Zone. No CDBG funds were used for economic

development, commercial development, or downtown improvements since other resources appear to be meeting local needs. It should be noted that the Renaissance Zone was recently approved for another five years.

The Housing Authority's self-sufficiency program uses a variety of resources to work with tenants to help them develop a strategy to escape poverty, including assistance with homeownership. CDBG has been used to fund public services and renovate public facilities serving persons who are homeless, disabled, or disadvantaged. For instance, the City has partnered with the Community Action Program to maintain a program which combines rental assistance (TBRA) with a self-sufficiency program in order to help tenants establish a positive rental history. The City also provides CDBG funds to 4 agencies to prevent homelessness. In turn, each agency provides supportive services or case management to help their clients. The City also continues to support the development or preservation of special needs housing with both CDBG and HOME funds.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City continues to collaborate with local agencies. This effort has included consultation with the Housing Authority, social service agencies, Regional Development Council, Community Action, homeless coalition, health care agencies, advocacy organizations, and other local groups. The City uses outreach to local housing agencies in order to promote joint efforts to develop affordable housing and special needs housing.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The Consolidated Plan recognized the Burleigh County Housing Authority as the primary housing agency for affordable housing in Bismarck. Accordingly, the City continues to work with the Housing Authority to develop and preserve affordable rental housing. This type of collaboration is evident in the use of CDBG and HOME funds for housing projects that preserve existing housing or create new housing, primarily for persons with special needs. The City also meets periodically with the regional CHDO and Regional Development Council to explore the possibility of joint endeavors. City membership in the local homeless coalition promotes awareness and cooperation. The City maintains contact with the Region VII Supportive Housing Development Collaborative to assess local need and resources. This affiliation has resulted in a joint effort to develop 40 units of supportive housing for homeless persons. The Housing Authority, Beyond Shelter (nonprofit), and the City worked together to realize this much needed housing. The local coalition for the homeless meetings provides a wonderful opportunity for local service providers and government to share concerns and knowledge.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

- The City adopted an Analysis of Impediments in 2015. It identified the following concerns:

discrimination on the basis of disability and familial status; failure to make reasonable accommodation; discriminatory advertising; higher loan denial rates for Native Americans & Hispanic households; discrimination against recipients of public assistance; lack of understanding of Fair Housing laws; shortage of accessible housing; & location of public assisted housing in areas of low income & minority concentration. Since then, the City was monitored by HUD's Office of Fair Housing & Equal Opportunity and received training on future requirements due in 2019. New concerns include identification of 4 areas or racially & ethnically concentrated areas; lack of accessible, affordable housing; lack of affordable housing for persons based on race & ethnicity; and people with disabilities living in segregated settings such as nursing homes. The following are actions taken to address these concerns:

- The City allocated CDBG funds for a housing accessibility program which makes improvements in private sector housing. Two low income households received assistance.
- The City worked with 2 agencies on outreach & education. Funding was from prior years, but activities continued into 2017. Legal Services provided assistance to low income households in order to prevent homelessness or to assist them to obtain affordable housing. High Plains Fair Housing did FH education & outreach. The City provided in-kind assistance with meeting rooms, publicity & outreach, and referrals to agencies.
- The Mayors' Committee on Human Relations sponsored Diversity University, an Intercultural Festival, & an essay contest for children.
- The Housing Authority did not propose the construction of new housing, but staff has consulted with its director about this issue.
- The City conducted outreach (mailings) to agencies serving low income households, persons with disabilities, minorities, housing agencies, etc. to encourage their participation in the CDBG process. CDBG notices (#2) include TDD, Voice, and Spanish relay information.
- Public hearings are conducted in the City/County Building which is fully accessible & located in the downtown, LMI area.
- The City Commission approved an anti-discrimination resolution discouraging biased employment, rental/housing, and service practices based on sexual orientation or gender identity.
- The City worked to improve access to its CDBG program and improve recordkeeping. This included year end analysis of beneficiary data (attachment 1). The analysis indicated that minorities benefitted at a slightly higher percentage rate than the 2010 Census. About 14% of the beneficiaries were persons with disabilities. The fewest minority beneficiaries were in housing, but these activities had high percentages of beneficiaries with disabilities.
- The City increased subrecipient reporting requirements on beneficiaries (new forms)

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City uses a variety of methods to monitor compliance and progress. Requests for CDBG funding are carefully reviewed to identify any potential issues before a project is funded. This effort includes a review by the City's Fiscal Services Division, checking the SAM system, and a review of prior experience with federal grants (and in particular CDBG). The City's Fiscal Services Division will also review audit reports from subrecipients annually. Technical assistance and project guidance is given to subrecipients at the beginning of the project year. All subrecipients must submit a performance report annually and upon project completion. In addition, the subrecipients must submit a report and support documentation with each request for payment. On-site visits are made to ensure compliance and to provide technical assistance. Additional materials or on-site training are provided upon request or when conditions warrant it. The City also uses consultants and training for subrecipients to increase knowledge (e.g., LBP). City staff use informal means to check compliance, such as phone calls or visits to discern progress or problems. Staff, A/E consultants, or rehab specialists verify project progress and completion when requests for payment are made for construction activities. The CAPER also gives the City an opportunity to assess overall progress and to address concerns. Delays in project implementation and major changes in staff at several agencies indicate that monitoring efforts and technical assistance are likely needed.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

A notice was placed in the Bismarck Tribune on August 10th to request comments on the City's performance in the administration of the CDBG program and Consolidated Plan. Another notice was published on August 16th to announce that the performance report was available for viewing and to request comments, and to announce that a public hearing was to be held on August 30th for the same purpose. Subrecipients could also comment when they submitted their annual reports. See Appendix 2. No comments were received.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

No changes in program objectives were made. An evaluation of the program indicates that few changes are needed in the program except that increased technical assistance and activity monitoring will be useful in the future since there have been several significant staff changes at subrecipient agencies. It will also be increasingly important to evaluate subrecipient capability and activity effectiveness as competitiveness for CDBG dollars increases. Consideration should also be given to funding fewer, but more effective, activities, since the CDBG program will be managed by a new, part-time employee. Consideration also needs to be given to how to deal effectively with new entities applying for funding and the importance of funding innovation.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

No changes in program objectives were made. An evaluation of the program indicates that few changes are needed in the program except that increased technical assistance and activity monitoring will be useful in the future since there have been several significant staff changes at subrecipient agencies. It will also be increasingly important to evaluate subrecipient capability and activity effectiveness as competitiveness for CDBG dollars increases. Consideration should also be given to funding fewer, but more effective, activities, since the CDBG program will be managed by a new, part-time employee. Consideration also needs to be given to how to deal effectively with new entities applying for funding and the importance of funding innovation.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

Attachment

Appendix 1

Accomplishments for Program Year 2016

Goal	Category	Funding	Annual Outcome			
			Indicator	Expected	Actual	% Completed
Allocate funds to prevent homelessness	Homeless	CDBG	Public Service other than LMI Housing	0	IDIS error (107)-- moved to homeless prevention	
			Homeless/overnight shelter	0	0	n/a
			Homelessness Prevention	55	107 including:	121%
			-Ald, Inc. (40)* -Salvation Army (45) ? -WCHSC (24) ? -Salvation Army* -WCHSC*	20 24 12	40 16 12	
Develop/renovate rental units	Affordable Housing	CDBG	Indicator	Expected	Actual	% Completed
			Rental Units Rehabilitated -Burleigh Co. Housing (?)	24	0	0
Improve the quality of public facilities	Non-Housing Community Development	CDBG	Indicator	Expected	Actual	% Completed
			Activities other than LMI Housing	2075	2769 includes:	
			2016 PY: -Senior Center* -CHYS-Hall Home (?) -Dacotah Found./Arbor (?)	2000/ ? ?	2312/ ? ?	115% 0% 0%
			2015 PY completed: -Youthworks* -DF/Rec. Ctr.*	326/ 135/ 1	326/ 135/ 1	

Promote special needs housing	Affordable housing non-homeless Special Needs	CDBG \$55,000	Indicator	Expected	Actual	Unit of Measure	% Completed
			Homeowner housing rehabilitated —Housing Accessibility?	12	5 (includes PV 15)	Households Assisted	42%
			Activities for LMI Housing Benefit	162	0	Households Assisted	0
Provide for homeless service providers	Homeless	CDBG 2016: \$3,521 2015:	Overnight shelter & other services: Welcome House* MVCHP 2015*	60 250	57 299	Persons Assisted	95%
Support efforts to increase LMI homeownership	Affordable housing	CDBG 2016: 66,516 2015:	Indicator Homeowner units rehabilitated Housing accessibility (note duplicated in spec. needs housing) Housing Accessibility* Emergency rehab?	Expected 12 12 15 12	Actual 9 (including: 2 3 4	Unit of Measure Household/Housing Unit	% Completed 75% 17%
Support public service activities	Non-Homeless Special Needs	CDBG 2016: \$2500 2015:	Indicator Other than LMI housing Portable dental equip.* Job search assistance* LMI housing benefit	Expected 200 40 0	Actual 337 21 0	Unit of Measure Persons Households	% Completed 168% n/a n/a
Renovation of facilities serving homeless	Homeless	CDBG \$16,337	Indicator Public facility or infrastructure AWRC renovation?	Expected 240	Actual 0	Unit of Measure persons	% Completed

*signifies completed projects; ? signifies unknown beneficiaries since project has not been completed.

Accomplishments: Consolidated Plan to date (2015-2019)

Goal	Category	Funding	Consolidated Plan Outcome to Date				
			Indicator	Expected	Actual	Unit of Measure	% Completed
Allocate funds to prevent homelessness	Homeless	\$120,000 CDBG	Public Services other than LMI Housing	0	0	Persons assisted	0
			Homeless/overnight shelter	0	0	Persons Assisted	n/a
			Homelessness Prevention	500	184	Persons Assisted	36.8%
Assist development of homeless housing	Homeless	\$45,000	Indicator Emergency/transitional beds added	Expected 10	Actual 0	Unit of Measure Beds	% Completed 0
Develop or renovate rental units	Affordable Housing	\$125,000 CDBG	Indicator	Expected	Actual	Unit of Measure	% Completed
			Rental Units Constructed	6	0	Household/units	0
			Rental Units rehabilitated	74	0	Household/units	0
Improve the quality of public facilities	Non-Housing Community Development	\$167,500 CDBG	Indicator	Expected	Actual	Unit of Measure	% Completed
			Activities other than LMI Housing	1850	2064	Persons Assisted	160%
			Indicator	Expected	Actual	Unit of Measure	% Completed
Promote special needs housing	Affordable housing non-homeless Special Needs	CDBG \$140,000	Activities other than LMI Housing	0	0	Persons Assisted	0
			Activities for LMI Housing Benefit (Heng Access.)	200	23	Households Assisted	11.5%
			Rental units constructed	5	0	Household/housing unit	0
			Rental units rehabilitated	72	0	Household/housing unit	0
			Homeless person overnight shelter	5	0	Persons Assisted	0
			Homeless/beds added	72	0	Beds	0
Provide for homeless service providers	Homeless	\$40,000 CDBG	Indicator	Expected	Actual	Unit of Measure	% Completed
			Services	800	356	Persons Assisted	44.5%

Support Efforts to increase LMI homeownership	Affordable housing	\$400,000 CDBG	Indicator	Expected	Actual	Unit of Measure	% Completed
				0	0	Household Housing Unit	
Support public service activities	Non-Homeless Non-Housing Special Needs	\$40,000	Indicator	135	23	Household Housing Unit	17.0%
				Expected	Actual	Unit of Measure	% Completed
				925	515	Persons Assisted	55.8%
Renovation of facilities serving homeless	Homeless	\$45,000 CDBG	Indicator	0	0	Households Assisted	0
				Expected	Actual	Unit of Measure	% Completed
				400	16	Households assisted	4%

**1. 2016 CDBG Beneficiaries by
Race and Ethnicity**

<u>Race</u>	<u>Persons</u>	<u>Percent</u>	<u>Hispanic</u>	<u>Households</u>	<u>Percent</u>	<u>Hispanic</u>
White	11,347	90.40%	117	21	91.30%	0
Black/African Am.	145	1.18%	2	0	0.00%	0
Asian	26	0.21%	0	0	0.00%	0
Native American	645	5.14%	11	0	0.00%	0
Nat. Hawaiian/Pac. Isl.	5	0.04%	1	0	0.00%	0
Nat. Amer/White	205	1.63%	3	0	0.00%	0
Black-Afr. Am/White	3	0.02%	0	0	0.00%	0
Nat. Amer/Black-Afr Am	2	0.02%	0	0	0.00%	0
Other	171	1.36%	8	2	8.70%	11
Total	12,552	-	142	23	1.13%	0%

Note.

2. 2010 Census/American Fact Finder

<u>Race</u>	<u>Number</u>	<u>Percent</u>
White	56,616	92.40%
Black/African American	400	0.65%
Native American	2773	4.53%
Asian	343	0.56%
Nat. Hawaiian/Pac. Isl	17	0.03%
Other	1123	1.83%
Total	61,272	

<u>Hispanic of Any Race</u>	<u>Number</u>	<u>Percent</u>
Hispanic	812	1.33%
Non Hispanic	60,460	98.67%
Total	61,272	

Beneficiaries by Category

Housing Expenditures: 17.3%
 Rehab-single unit: 9 households
 Rehab-multi-family: 0 units

Percent of Total Disbursements
 17.29%
 0%

Public Facilities Expenditures: 36.9 %

General: 8,193 persons
 Senior Centers: 2,312 persons
 Handicapped Centers: 131
 Youth Centers: 326 persons
 Abused & Neglected Children: 16

Percent of Total Disbursements
 .96%
 17.7%
 1.3%
 9.5%
 1.18%

Public Services Expenditures: 28.9%

Operating/Homeless: 356 persons
 Gen. Public Services: 5 persons
 Legal Services: 17 persons
 Employment Training: 31 persons
 Fair Housing: 15 persons
 Health Services: 33/
 Substance payment: 107

Percent of Total Disbursements
 7.29%
 .11%
 1.18%
 1.18%
 .67%
 1.48%
 16.69%

Income of CDBG Beneficiaries

	Number	Percent
Extremely low income	751	6.23%
Low income	10,924	90.69%
Moderate income	286	2.37%
Total Low & Moderate income	11,961	99.30%
Non Low & Moderate income	84	.70%
Total	12,045	

Other beneficiary information

Type of Activity	Female headed household	Elderly	Persons with Disabilities	Total # of beneficiaries
Homeless Services	133	19	201	468
Other Services	247	337	358	390
Housing	4	2	7	9
Public Facilities	612	2312	970	2795
TOTALS	996	2670	1536	3652
Percent of Total	27%	73%	42%	n/c

Note: the one public facilities project without direct beneficiaries (e.g., accessibility improvements that used Census data for number of persons with disabilities within the City) was not included in the above table.

Section 504 Effective Communication Policy

Section 504 provides that no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The City of Bismarck in administering HUD grant programs is committed to ensuring that applicants, employees, subrecipients, program beneficiaries, and other members of the public with disabilities have an effective way to communicate. When requested, City employees and its contractors and subrecipients shall furnish appropriate auxiliary aids and services so that persons with disabilities have an equal opportunity to participate in and receive the benefits of programs, services and activities. Services to persons with Limited English Proficiency will be provided assistance consistent with the City's LEP Plan. All notifications, including responses to requests for effective communication referenced in this Policy, will be provided in an alternative format upon request.

Auxiliary Aids and Services

Auxiliary aids are services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in programs or activities conducted by the City. For example, auxiliary aids for persons with impaired vision may include readers, Braille material, audio recordings, telecommunication devices, etc. Auxiliary Aids useful for persons with impaired hearing include telephone handset amplifiers, telecommunication devices for deaf persons (TDD's), written materials, etc.

Request for Effective Communication

When an auxiliary aid or service is needed for communication, the City will provide an opportunity for an individual with a disability to request the aid or service of his or her choice. All requests must be received at least two weeks prior to the date the service is needed. In urgent or unusual circumstances, the City will still take reasonable steps to secure the requested assistance even if the request was made without a two week notice. The City will give primary consideration to the choice expressed by the person unless it can show that another equally effective means of communication is available or that its use would result in a fundamental alteration of its activities or would cause an undue financial and administrative burden. All requests shall be submitted to the 504 compliance officer at the below address. The Section 504 Compliance Officer is the person in charge of the administration of HUD grants for the City.

Section 504 Compliance Officer
Community Development Department – Planning Division
PO Box 5503
221 N. 5th Street
Bismarck, ND 58506-5503
(701)355-1847 Fax: (701)222-6450 TDD 711 or Relay 800-366-6889
e mail: planning@bismarcknd.gov

If a person with a disability that has an impairment that impedes the writing or mailing of a request, she or he may use any other effective means to request assistance. However, all requests must include the person's name, address and phone number.

Upon receipt of the request, the Compliance officer will consult with the individual to determine the preferred type of auxiliary aid or service. Within seven business days the Compliance Officer

will notify the requesting person in writing (or by alternative means upon request) if the preferred type of assistance is available or is not available. In addition, this communication will present options if the preferred assistance is unavailable or not required. If the person needs to reschedule the meeting, a request must be submitted at least three (3) business days prior to the meeting. The Compliance Officer will maintain copies of all requests and responses for three years.



Procedures

- Notice to applicants: A notice will be posted for applicants to contact the Compliance Officer or subrecipient administrator if auxiliary aids or services are needed. This notice will be posted prominently in applicable offices, including those of subrecipients that provide services.
- All requests for auxiliary aids or services must be made at least two weeks prior to the date the service is needed.
- Letterhead, public notices and other public communication will include the TDD and relay numbers.
- Subrecipients will receive a copy of this policy.
- Public meetings will be held at buildings that are accessible.

Grievance Procedures:





An individual with a disability may file a complaint and request a hearing if he or she is not satisfied with responses from the City or its subrecipient concerning a request for an auxiliary aid or service. A hearing will be held within fifteen (15) calendar days of the receipt of the appeal. The grievance may be communicated orally or in writing. However, all oral grievances must be reproduced in writing and maintained in program files. The City shall provide assistance to a person requesting help in filing a grievance, including assistance in converting an oral complaint to writing. An impartial hearing officer will conduct the hearing. Within two weeks of the informal hearing, the hearing officer shall render a decision and provide a copy to all parties.

Appendix 2

 	Classified Advertising Invoice	Bismarck Tribune PO BOX 540 Waterloo, IA 50704-0540 800-418-1547
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CGDB PLANNER - COMM. DEV. PLANNING SUE REDMAN PO Box 5503 BISMARCK ND 58506-5503	Customer: 60062391 Phone: (701) 355-1847 Date: 08/18/2017
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 AUG 21 2017

<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th>Date</th> <th>Order #</th> <th>Type</th> <th>Order Amt.</th> </tr> <tr> <td>08/18/17</td> <td>20904679</td> <td>INV</td> <td>35.69</td> </tr> </table>	Date	Order #	Type	Order Amt.	08/18/17	20904679	INV	35.69	CREDIT CARD PAYMENT (circle one) <div style="display: flex; justify-content: space-around;">     </div> Card #: _____ Exp. Date: _____ Signature: _____ Credit card users: Fax to 319-291-4014
Date	Order #	Type	Order Amt.						
08/18/17	20904679	INV	35.69						

PLEASE DETACH AND RETURN TOP PORTION WITH YOUR PAYMENT

Lee Enterprises no longer accepts credit card payments sent via e-mail. Emails containing credit card numbers will be blocked. Please use the coupon above to send a credit card payment to remittance address located in the upper right corner. You may also send the coupon to a secure fax at 319-291-4014.

Date	Date	Times Run	Description	Lines	Class Code	Order Amt	Net Amt Due
08/18/17	08/18/17	1	CDDB Performance Report	43.00	Legals	35.69	35.69
			Bismarck Tribune				

Affidavit of Publication
 State of North Dakota) SS. County of Burleigh
 Before me, a Notary Public for the State of North Dakota, personally appeared SUE REDMAN, who being duly sworn, deposes and says that he (she) is the Clerk of Bismarck Tribune Co., and that the publication(s) were made through the Bismarck Tribune on the following dates: 8/18. Signed [Signature]
 sworn and subscribed to before me this 18 day of August, 2017.
[Signature]
 Notary Public in and for the State of North Dakota

Public Notice Concerning Bismarck's CDDB Performance Report
 The City of Bismarck invites the public to comment for the next 15 days on its annual Community Development Block Grant (CDBG) Performance Report. This report reviews the City's administration of its 2016 Community Development Block Grant (CDBG) Program. CDBG funds must be spent for activities that primarily benefit low income persons, moderate and blighted conditions, or address urgent community conditions. Activities implemented in 2016 include: emergency housing repairs; accessibility improvements to housing; renovation of affordable rental housing and special needs housing; portable dental equipment for nursing homes; improvements to facilities serving youth, seniors, and homeless persons and services to prevent homelessness.
 The report also evaluates the City's progress in implementing the second year of its five-year Consolidated Plan, which serves as the City's overall strategy for using HUD funds. The report is available for viewing during normal business hours in the Community Development Office. Alternative formats are available upon request. Written comments will be accepted until 1 pm on Thursday, August 31, 2017.
 The City will review and include all comments in the Performance Report, which will be sent to HUD. Comments or requests for assistance may be sent to: Community Development Department, 211 North 5th Street, PO Box 5503, Bismarck, ND 58506-5503. Phone: (701) 355-1840. Fax: (701) 222-6450. TDD: (701) 222-6450. Relay: (800) 435-8330. A Voice: 800-366-6889. E-mail: sredman@bismarcknd.gov. 6/16 - 20904671

ELIZABETH A. SIMES
 Notary Public
 State of North Dakota
 My Commission Expires May 26, 2023

Please return invoice or put order number on check. Thank You.	
Remarks	
Bismarck Tribune www.bismarcktribune.com PO BOX 540 Waterloo, IA 50704-0540	35.69

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**CITY OF BISMARCK
PUBLIC NOTICE CONCERNING
THE CDBG PROGRAM**

The City of Bismarck invites its citizens to comment on its performance in the administration of the Community Development Block Grant (CDBG) Program for 2016-17. CDBG funds must be spent on activities that benefit low and moderate income people, eliminate slums and blight, or address urgent distress. The 2016 program includes: emergency housing repair; accessibility improvements to housing; renovation of affordable rental housing and special needs housing; portable dental equipment for nursing homes; improvements to facilities serving youth, seniors, and homeless persons and services to prevent homelessness.

Comments will be included in the Annual Performance report which is sent to HUD for review. The draft report will be available for viewing in August. The public may comment as follows:

1. At a public hearing:
Thursday, August 3, 2017 at 5:15 pm
David Blackwood Room - Second Floor
City County Building - 221 N. 3rd Street
2. By sending comments or requests for assistance to:

Bismarck Community Development
Department
PO Box 5503
Bismarck, ND 58506-5503
Phone: (701) 353-1845
Fax: (701) 222-6450
TDD: 711
ND Relay Service: 800-435-3590 B.
Voice: 800-366-1889
E-mail: comment@bismarcknd.gov
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